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VIA ECF (with courtesy copy to: Torres_NYSDChambers@nysd.uscourts.gov)

Hon. Analisa Torres
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
Courtroom 15D
New York, NY 10007-1312

Re: Casa Express Corp, as Trustee of Casa Express Trust v. Bolivarian Republic
of Venezuela; 18-CV-11940 (AT) (KNF)

Dear Judge Torres:

This firm represents Casa Express Corp, as trustee of Casa Express Trust (“Casa Express”), the plaintiff in the above-referenced action. The defendant in this action, the Bolivarian Republic of Venezuela (“Venezuela”), has not yet answered or otherwise moved with respect to the complaint, and its deadline to do so expired on March 25, 2019 (ECF No. 11). Nor has Venezuela otherwise appeared in this action or even contacted the undersigned, including through counsel, and, as of now, we have no reason to believe it plans to.

Accordingly, pursuant to Section II(B) of the Court’s Individual Practices in Civil Cases, Casa Express requests that the Court adjourn the initial pretrial conference currently scheduled to take place on April 3, 2019, at 11:40 a.m. (ECF No. 13). If granted, this will be the second adjournment of the initial pretrial conference. The original initial pretrial conference date of March 13, 2019 (ECF No. 9), was adjourned to its current date at Casa Express’ request (ECF No. 12) to better accord with Venezuela’s deadline to appear.

Casa Express intends shortly to seek a default judgment.

Respectfully submitted,

/s/ Jeremy Wallison